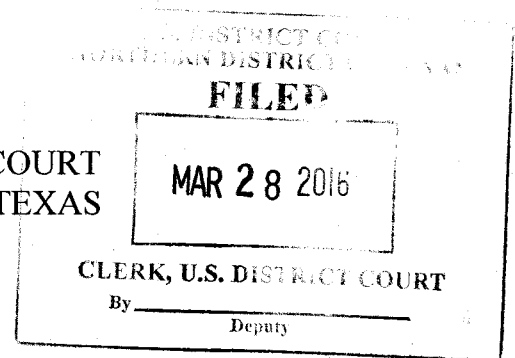


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

No. 4:16-MJ-168

JOSHUA MATTHEW BLACKKETTER (01)
ANDREW CARLOS DELFELD
a/k/a "Draven" (02)
ROBIN LYNN HUGHES (03)
MICHAEL WESLEY JOHNSON
a/k/a "Mike Jones" (04)
LESLIE LAUREN PAYNE (05)

SEAL
UNTIL WARRANT EXECUTED

CRIMINAL COMPLAINT

Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. § 846)

Beginning in or before January 2015, and continuing until on or about April 1, 2016, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendants **Joshua Matthew BLACKKETTER**, **Andrew Carlos DELFELD**, also known as Draven, **Robin Lynn HUGHES**, **Michael Wesley JOHNSON**, also known as Mike Jones, and **Leslie Lauren PAYNE**, along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), namely to possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of Methamphetamine, a Schedule II controlled substance.

In violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(B)).

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

I. INTRODUCTION

1. I have been a Special Agent of the DEA for approximately 17 years. I received basic investigative instruction at the DEA Academy located in Quantico, Virginia, and additional continuing instruction regarding investigative techniques. I am currently assigned to the Fort Worth Resident Office (FWRO) of the DEA, Dallas Field Division, working with Investigators and Officers from the Fort Worth Police Department.
2. I have participated as a law enforcement officer in several investigations of unlawful narcotics distribution and have conducted wiretap investigations, physical and electronic surveillances, undercover transactions, the execution of search and arrest warrants, debriefings of informants, and review of taped conversations and drug records. Through my training, education and experience, I have become familiar with the manner in which illegal drugs are transported, stored and distributed, and the methods of payments for such drugs. I am also familiar with some of the methods by which narcotics traffickers communicate and code words commonly used by narcotics traffickers.

II. SUMMARY OF PROBABLE CAUSE THAT A VIOLATION OF 21 U.S.C. § 846 HAS OCCURRED

3. As part of the conspiracy, not every person named or identified in the conspiracy knew every other person identified as being in the conspiracy. It was their joining together for the common purpose of possessing and distributing methamphetamine, the nature of the scheme to possess and distribute methamphetamine, and the overlapping

among its members in possessing and distributing methamphetamine that established their membership in this particular conspiracy. And not every member of the conspiracy knew the details of each aspect of the conspiracy. Nevertheless, each member of the conspiracy knew or was aware of the conspiracy's general purpose and scope, which was to possess and distribute methamphetamine in the Northern District of Texas and elsewhere, between and among the named conspirators and others not named.

4. As part of the conspiracy, its members had a fluid hierarchy that evolved over time. For example, as some members were arrested or otherwise temporarily unavailable, other members took over the receipt and delivery of methamphetamine.

5. Since approximately 2014, the government has been investigating allegations that **Joshua Matthew BLACKKETTER**, **Andrew Carlos DELFELD**, also known as Draven, **Robin Lynn HUGHES**, **Michael Wesley JOHNSON**, also known as Mike Jones, and **Leslie Lauren PAYNE**, along with Matthew Rutledge, Chris Nicholson, Shanda Hawkins, and Gavin Seguin, not named as defendants herein, and others not named have conspired together to possess methamphetamine with the intent to distribute it in the Northern District of Texas and elsewhere.

6. As part of the conspiracy, **Joshua Matthew BLACKKETTER**, **Andrew Carlos DELFELD**, also known as Draven, **Robin Lynn HUGHES**, **Michael Wesley JOHNSON**, also known as Mike Jones, and **Leslie Lauren PAYNE**, agreed to possess methamphetamine with the intent to distribute it, and knowingly and willfully participated in that agreement.

7. As part of the conspiracy, the common purpose between and among **Joshua Matthew BLACKKETTER**, **Andrew Carlos DELFELD**, also known as Draven, **Robin Lynn HUGHES**, **Michael Wesley JOHNSON**, also known as Mike Jones, and **Leslie Lauren PAYNE**, along with others was to possess and distribute methamphetamine in the Northern District of Texas and elsewhere.

8. As part of the conspiracy, in general, **Joshua Matthew BLACKKETTER**, **Andrew Carlos DELFELD**, **Robin Lynn HUGHES**, and **Michael Wesley JOHNSON** distributed methamphetamine to Erica Ayala, Tiffany Bradberry, Jennifer Church, Christina Pugh, and others who then re-distributed or brokered methamphetamine transactions between and amongst **Leslie Lauren PAYNE** and others.

9. As part of the conspiracy, its members routinely received and delivered ounce and multi-ounce quantities of methamphetamine that they then distributed to others in the Northern District of Texas and elsewhere.

10. As part of the conspiracy, some of the money derived from the sale and distribution of methamphetamine would be used to purchase additional quantities of methamphetamine.

III. **FACTS ESTABLISHING PROBABLE CAUSE THAT A VIOLATION OF 21 U.S.C. § 846 HAS OCCURRED**

11. Below is a chronology of some relevant events:

- a. Seizure of approximately one pound of methamphetamine from Erica Ayala, on December 9, 2014.

- b. Arrest of Erica Ayala and Jessica Rosemergy on January 8, 2015 by the North Richland Hills Police Department and the seizure of approximately one-half (½) ounce of methamphetamine and a Remington 870 shotgun.
- c. Arrest of Gavin Seguin, on March 17, 2015, by Agents/Officers with Homeland Security, and the Fort Worth Police Department executed a search warrant at the residence of Rachel Adams, located at 1002 Cotton Wood Dr., Benbrook, Texas.
- d. Arrest of Shanda Hawkins, on March 27, 2015, on an outstanding Federal Arrest Warrant.
- e. Arrest of Tiffany Bradberry, on June 15, 2015, on an outstanding Federal Arrest Warrant.
- f. Arrest of Christina Pugh, on June 15, 2015, on an outstanding Federal Arrest Warrant.
- g. Arrest of Jennifer Church, on June 17, 2015, on an outstanding Federal Arrest Warrant.

12. Co-conspirator Christina Pugh identified **Joshua Matthew BLACKKETTER** as a methamphetamine distributor whom she (Pugh) had on approximately one (1) occasion witnessed in possession of three (3) ounces of methamphetamine. Additionally, Pugh said that on approximately fifteen (15) occasions she observed **BLACKKETTER** in possession of one (1) ounce quantities of methamphetamine. Co-conspirator Jennifer Church confirmed that **BLACKKETTER** was involved in distributing methamphetamine. Specifically, Church said that on approximately seven (7) occasions she traveled with **BLACKKETTER** when he picked up two (2) ounce quantities from co-conspirator Erica Ayala and that on at least fifteen (15) occasions she (Church) purchased two (2) ounce quantities of methamphetamine from **BLACKKETTER**.

13. Co-conspirator Jennifer Church identified **Andrew Carlos DELFELD** as a methamphetamine distributor whom she (Church) had on at least four (4) occasions purchased one (1) ounce quantities of methamphetamine from. Additionally, Church said that on approximately three (3) occasions she supplied **DELFELD** with one (1) ounce quantities of methamphetamine. Co-conspirator Christina Pugh confirmed that **DELFELD** was involved in distributing methamphetamine. Specifically, Pugh said that on approximately five (5) occasions she observed **DELFELD** in possession of four (4) ounce quantities of methamphetamine. Co-conspirator Tiffany Bradberry confirmed that **DELFELD** was involved in distributing methamphetamine. Specifically, Bradberry said that on approximately ten (10) occasions she observed **DELFELD** in possession of four (4) ounce quantities of methamphetamine.

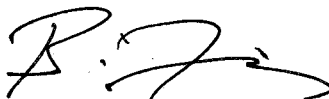
14. A cooperating defendant (hereinafter CD) identified **Robin Lynn HUGHES** as a methamphetamine distributor whom he (the CD) had on approximately fifteen (15) occasions accompanied to meet her methamphetamine customers who were themselves from Oklahoma. The CD also said that on each of these trips **Robin Lynn HUGHES** delivered between eight (8) and ten (10) ounces of methamphetamine to her customers. Co-conspirator Tiffany Bradberry confirmed that **HUGHES** was involved in distributing methamphetamine. Specifically, Bradberry said that based on her participation in the drug conspiracy she knew that on a daily basis for a two month period **HUGHES** picked up one (1) ounce quantities of methamphetamine from co-conspirator Matthew Rutledge, who was one of her methamphetamine sources of supply.

15. Co-conspirator Tiffany Bradberry identified **Michael Wesley JOHNSON** as a methamphetamine distributor whom she (Bradberry) had on a daily basis for an approximately three (3) month time period in 2014 accompanied to receive approximately four (4) ounces of methamphetamine from multiple sources of supply to include co-conspirator Erica Ayala. Bradberry also said that in January 2015 she and **JOHNSON** were “fronted” four (4) ounces of methamphetamine by co-conspirators Gavin Seguin and Shanda Hawkins. During this transaction, Chris Nicholson, Matthew Rutledge, and Jerry Curry arrived at the apartment where the drug deal was taking place. Bradberry also said that neither she nor **JOHNSON** ever paid for the four (4) ounces of methamphetamine, which resulted in the Aryan Brotherhood of Texas (ABT) putting out an “SOS” (ABT term meaning “Smash on Sight”) on **Michael Wesley JOHNSON**. Co-conspirator Gavin Seguin confirmed that **JOHNSON** was involved in distributing methamphetamine. Specifically, Seguin stated that on at least three (3) occasions he and Shanda Hawkins had supplied **JOHNSON** with four (4) ounce quantities of methamphetamine.

16. Co-conspirator Alisha Feeney identified **Leslie Lauren PAYNE** as a methamphetamine distributor whom she (Feeney) had on at least four (4) occasions supplied with sixteen (16) ounces of GHB and on at least five occasions with ten (10) ounce quantities of GHB. Additionally, Alisha Feeney said that on approximately two (2) occasions she (Feeney) observed **PAYNE** purchase eight (8) ounce quantities of

methamphetamine and on approximately five (5) occasions she observed **PAYNE** purchase four (4) ounce quantities of methamphetamine. And the CD confirmed that **PAYNE** was involved in distributing methamphetamine. Specifically, the CD said that on at least five (5) occasions he (the CD) observed **PAYNE** in the possession of one (1) and two (2) pound quantities of methamphetamine. Additionally, the CD said that on multiple occasions he (the CD) observed **Leslie Lauren PAYNE** supply others with ounce quantities of methamphetamine.

17. Based on the foregoing, the Complainant believes that probable cause exists that **Joshua Matthew BLACKKETTER, Andrew Carlos DELFELD**, also known as Draven, **Robin Lynn HUGHES, Michael Wesley JOHNSON**, also known as Mike Jones, and **Leslie Lauren PAYNE**, along with others both known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(B), namely to distribute and to possess with intent to distribute more than 50 grams of methamphetamine, in violation of 21 U.S.C. § 846.



Brian Finney
Special Agent
Drug Enforcement Administration

SWORN AND SUBSCRIBED before me, at 10:41 am/pm, this 28th day of March, 2016, in Fort Worth, Texas.



JEFFREY L. CURETON
United States Magistrate Judge